

**UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT
WORTH DIVISION**

KELLY BLAND,

Plaintiff,

v.

1ST TEXAS HEALTH & LIFE LLC, a Texas Limited Liability Company, AARON HANSOME,
an individual, and JOHN DOE,
Defendants.

Civil Action No. 4:24-cv-01022-O-BP

DEFENDANT'S MOTION TO COMPEL PLAINTIFF'S DISCOVERY RESPONSES

TO THE HONORABLE JUDGE HAL R. RAY, JR.:

Defendant Aaron Hansome respectfully moves this Honorable Court to compel Plaintiff Kelly Bland to provide full and complete responses to Defendant's First Set of Interrogatories, Requests for Production, and Requests for Admission, which were served on March 23, 2025 and clarified by corrected responses on March 24, 2025. In support thereof, Defendant states as follows:

I. INTRODUCTION AND BACKGROUND

1. On March 23, 2025, Defendant served Plaintiff via email with his discovery responses and requests. Although both attached ZIP files were labeled as "responses," the accompanying email **clearly identified that one file contained Defendant's responses to Plaintiff's discovery and the other contained Defendant's own discovery requests.**
2. On March 24, 2025, Defendant followed up with a correction to address limited clerical issues involving duplicate content in the responses to Plaintiff's Requests for Admissions. Specifically, Defendant had inadvertently duplicated the response to Request for Admission No. 51 in his answer to Request No. 52. The March 24 version corrects that duplication and provides a distinct, substantive response to Request No. 52. The

corrected RFA responses are more than 50 pages and so were presently omitted but are available upon request. A screenshot of that March 23 email is submitted as Exhibit A.

3. On May 8, 2025, Defendant emailed Plaintiff to confer in good faith pursuant to Local Civil Rule 7.1(b) regarding Defendant's motion to strike. That same communication also reminded Plaintiff that the discovery requests were overdue, having been served on March 23, 2025, now 49 days prior. As of the filing of this motion on May 11, 2025, Plaintiff has not responded.

II. ARGUMENT AND AUTHORITIES

Under Federal Rule of Civil Procedure 37(a)(3)(B), a party may move for an order compelling discovery if the opposing party fails to respond to properly served interrogatories, requests for production, or requests for admission. Local Civil Rule 7.1 and 191.2 further require a certificate of conference confirming that the movant attempted in good faith to resolve the dispute before involving the court.

Here, Defendant has satisfied all requirements:

- Discovery requests were timely served;
- Defendant clarified clerical mislabeling and followed up with corrections;
- A good-faith effort to confer was made on May 8, 2025;
- Plaintiff remains non-responsive more than 30 days after service.

The Court should compel Plaintiff to respond within seven (7) days to avoid further delay and obstruction.

III. REQUEST FOR RELIEF

WHEREFORE, Defendant respectfully requests that the Court:

1. Compel Plaintiff to serve full and complete responses to Defendant's First Set of Interrogatories, Requests for Production, and Requests for Admission within seven (7) days of the Court's order;
2. Deem any Requests for Admission admitted pursuant to Rule 36(a)(3) if no timely objection or answer is given;

3. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Aaron Hansome

Aaron Hansome

Pro Se Defendant

641 E. San Ysidro Blvd., B3328

San Ysidro, CA 92173

AaronMHansome@gmail.com

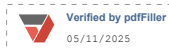
(619) 289-7442

CERTIFICATE OF CONFERENCE

Pursuant to Local Civil Rule 7.1(b), I certify that on May 8, 2025, I emailed Plaintiff in a good-faith attempt to confer regarding her overdue discovery responses. As of May 11, 2025, no response has been received.

Aaron Hansome

Aaron Hansome



CERTIFICATE OF SERVICE

I certify that on May 11, 2025, a true and correct copy of this Motion to Compel was served via email to:

Kelly Bland

Plaintiff, Pro Se

kellybland516@gmail.com

/s/ Aaron Hansome

Aaron Hansome

Hansome Discovery Responses & Requests

Inbox x

✕

🖨

 **Aaron Hansome** <aaronmhansome@gmail.com>
to Kelly ▾

Mar 23, 2025, 7:38 PM ☆ 😊 ↩

Good evening Mrs. Bland,
Please find attached my discovery responses and requests.

Thank you.



Kind regards,
Aaron Hansome

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2 Attachments • Scanned by Gmail ⓘ

